

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2000

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Docket No. R2000-1

**SUGGESTED MODIFICATIONS TO THE PROCEDURAL SCHEDULE
BY THE
ALLIANCE OF NONPROFIT MAILERS
AMERICAN BUSINESS PRESS
DOW JONES & COMPANY, INC.
MAGAZINE PUBLISHERS OF AMERICA
NATIONAL NEWSPAPER ASSOCIATION
THE MCGRAW-HILL COMPANIES, INC.
AND
TIME WARNER INC.**

(February 9, 2000)

The Presiding Officer's Ruling No. R2000-1/1, issued January 27, 2000, invited suggestions for alterations to the proposed procedural schedule for this docket. The Alliance of Nonprofit Mailers (ANM), American Business Press (ABP), Dow Jones & Company, Inc. (Dow Jones), Magazine Publishers of America (MPA), the National Newspaper Association (NNA), the McGraw-Hill Companies, Inc. (McGraw-Hill) and Time Warner, Inc. (TW) request that the Commission enlarge the period for discovery directed toward the Postal Service's direct case and provide additional time for the preparation of intervenors' direct cases, as described below.

We propose that the date for completion of discovery on the Postal Service's direct case be extended from March 16th to March 23rd and that the date for filing the case-in-chief of each participant be extended from May 5th to May 19th. These changes would provide these and other intervenors with a more reasonable time frame to address the plethora of issues presented by the Postal Service, including the double digit increase in the rate for Periodicals and the new costing models that are presented for the first time in this proceeding. Moreover, the Commission's Notice of Inquiry No.1 raises the prospect of increasing substantially the early burdens on intervenors, and we reserve the right to modify this request depending upon the outcome of the issues surrounding these crucial data issues.

The sixty-four days allowed in the proposed schedule for discovery is inadequate. More time should be afforded participants such as these intervenors who bear a heavy burden as they seek to discover ways to reduce the costs attributed to their use of the Postal Service.

In addition, we also suggest that each of the deadlines subsequent to the filing of participants' cases-in-chief should be extended by two weeks to reflect the additional time dedicated to developing and providing the Commission with cogent and responsive testimony. As it now stands, the proposed schedule without these suggested alterations is heroic in attempting to complete the schedule through briefing in 213 days. That task took 246 days in R97-1, 228 days in MC95-1, 220 days in R94-1 and 248 days in R90-1. To alleviate some of the overall pressures occasioned by the requirement of a decision in ten months, we support the elimination of the oral argument scheduled for August 22-23rd.


For the foregoing reasons, ANM, ABP, Dow Jones, MPA, McGraw-Hill, NNA and TW request the adoption of these changes in the procedural schedule contained in the Presiding Officer's Ruling No. R2000-1/1.

Respectfully submitted,


James R. Cregan
Anne R. Noble

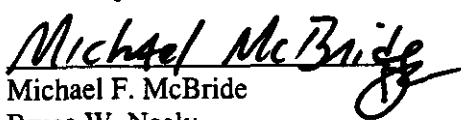
Magazine Publishers of America
1211 Connecticut Avenue, N.W.
Suite 610
Washington, D.C. 20036
(202) 296-7277 (office)
(202) 296-0343 (facsimile)

Counsel for
Magazine Publishers of America


David R. Straus
Mercia E. Arnold

Thompson Coburn LLP
700 14th Street, N.W.
Washington, D.C. 20005-2010
(202) 508-1000 (office)
(202) 508-1010 (facsimile)

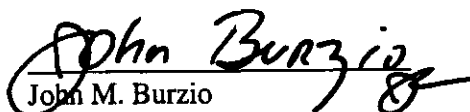
Counsel for
American Business Press



Michael F. McBride
Bruce W. Neely
Joseph H. Fagan

LeBoeuf, Lamb, Green & Mac Rae, L.L.P.
1875 Connecticut Avenue, N.W.
Suite 1200
Washington, D.C. 20009-5728
(202) 986-8000 (office)
(202) 986-8102 (facsimile)

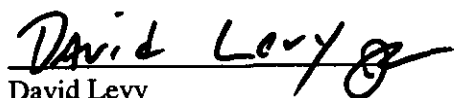
Counsel for
Dow Jones & Company, Inc.



John M. Burzio
Timothy L. Keegan

Burzio & McLaughlin
Canal Square
Suite 540
1054 31st Street, N.W.
Washington, DC 20007-4403
(202) 965-4555 (office)
(202) 965-4432 (facsimile)

Counsel for Time Warner Inc.



David Levy

Sidley & Austin
1722 Eye Street, N.W.
Washington, D.C. 20006-3704
(202) 736-8214 (office)
(202) 736-8711 (facsimile)

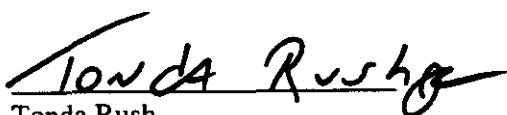
Counsel for
Alliance of Nonprofit Mailers



Timothy W. Bergin

Squire, Sanders & Dempsey L.L.P.
1201 Pennsylvania Ave., N.W.
P.O. Box 407
Washington, D.C. 20044-0407
(202) 626-6600 (office)
(202) 626-6780 (facsimile)

Counsel for
McGraw-Hill Companies, Inc.



Tonda Rush
Senny Boone

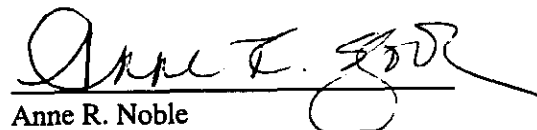
King & Ballow
P.O. Box 50301
Arlington, VA 22205
(703) 534-5750 (office)
(703) 534-5751 (facsimile)

Counsel for
National Newspaper Association

February 9, 2000

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with the Commission's Rules of Practice.


Anne R. Noble

Washington, D.C.
February 9, 2000